

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, )  
vs. )  
CHIGBO PETER UMEH, )  
Defendant. )  
Plaintiff, )  
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No. 09 cr. 524 (JSR)

DECLARATION OF CHIGBO UMEH  
ON THE EVENTS THAT TOOK PLACE  
IN LIBERIA IN MAY, 2010

I, Chigbo Umeh, depose and state that the following facts are true and correct under the penalty of perjury to wit:

1. Santiago arrived on Thursday May 14th, 2010, in Liberia.
2. On the same day, we had a meeting with "Nabil" Spyro, Fumbah and Anthony Soul.
3. I introduced Santiago to them as my contact person from Colombia who is going to give the "go ahead" for the transportation to Liberia.
4. The tape recording at this meeting was made available to me.
5. There were several other meetings between me and Santiago in the Hotel Cristal restaurant which we were staying.

6. During our stay at the hotel we discussed, on a daily basis, what was going on in Liberia, how we felt about things and what his partners in Colombia were telling him.

7. While we were in the restaurant eating, before we had seen Spyro "Nabil", we would have to discuss what we would tell "Nabil", about the latest conversations we had with Ocevedo and the other partners in Colombia.

8. Somedays after Santiago arrived in Liberia, he told me that he would like to send some money to his family in Colombia and I believe either Nabil was with us, or I asked Nabil to help out with sending the money to his family, and they made arrangements to do that.

9. Santiago said he saw "Nabil" with a Samsung cellphone he wanted to buy and also a laptop computer, since he needed to communicate with his partners in Colombia.

10. On the 2nd or 3rd day after Santiagos arrival in Liberia, he went out to have lunch with Nabil at another hotel, Mambo Point, and when he returned from this outing between him and Nabil, Santiago told me that he would like to change his accomodations from Hotel Cristal, where we were staying, to Mambo Point Hotel, where he had lunch with Nabil because he liked it better than where we were staying at the moment.

11. I agreed and called Nabil and told him that it was okay with me since Santiago told me it had been discussed with him.

12. Santiago and I always sat together after having breakfast or lunch to talk about opportunities that we could have concerning drugs, while also getting to know each other better.

13. Santiago told me that his wife is from Brasil and she is living there with their son in Fortelleze.

14. On one of these occassions, Santiago suddenly told me that he was worried about some deal he was doing at the moment and was hoping that all would go well.

15. I asked for further information and he told me that he and his other partners from his brother, had sent some cocaine to the U.S.A. which he (Santiago) invested 50kg or more and there is more drugs going to Mexico which he invested 500kg or more of cocaine.

16. We discussed how he and his partner are doing it and I told him if we succeed in doing this very drug deal to Liberia, you will see that it is much better, money wise, and safer than the other dealings he is involved with this moment.

17. One or two days later, when we sat down to eat lunch, Santiago told me that he was very happy because the drugs he had sent to the U.S.A. had arrived safely in New York.

18. Santiago then asked me if I knew people in New York who can help distribute it since he is here with me and has some drugs there, so I can make some money from selling it as a favor which is very normal amongst drug dealers who know each other.

19. Santiago took me by surprise by asking me this and I told him then and there that I do not engage with drug deals in the U.S.A because of my past experience with the U.S.A. Drug Enforcement Agency (DEA). Furthermore, I advised him that after this very drug deal is over, that he should exclude himself from further dealings which include the U.S.A. because he is not safe from prosecution, even when he is not present in the U.S.A.

20. I went into more detail and told him that he can be sent to prison for other peoples actions if they get arrested and call his name as the source for the drugs.

21. Santiago told me that he has experienced what I was talking about once in New York, but he was lucky to escape with his brothers passport. I believe he told me that he can still go to the U.S.A. with his brother's passport.

22. I told Santiago it is best for him to stop any more drug deals to the U.S.A. and if he can deliver some drugs to Sao Paula, Brazil, that I will take over from there and help him send it to Europe where they will make more money than the U.S.A.

23. I also told Santiago that if he and his partners has any more drugs in any part of Europe, that I could help them sell it there and make sure they get their money.

24. I remember that during all of these times I am with Santiago, he had the same kind of hand-bag as Nabil. It was made by Montebanc or Bally Fashion Designer, and this is where they kept the recorder that they used to video tape our conversations.

25. Santiago was always with this bag, wherever he went with me.

26. On one occassion, I believe it was on May 14, 2010, after our meeting with Nabil where Yoroshenko was present, on our way back to the hotel with Officer Derrick, Santiago asked me a question.

27. Santiago asked who is going to bring the money to give Yoroshenko because he needed money upfront to transport the drugs for us.

28. I responded to Santiago that "I believe that Nabil is crazy to believe what Yoroshenko was telling him, and I don't need Yoroshenko because I have my own plan of transporting my drugs that is less expensive for me to where I want, and two, he does not have the power to make any decision because Cyril Allen, the guy we went to see in his house, is by far the most important person involved in this connection from my point of view. This is the reason I went with him to introduce them to each other."

29. All of these conversations were recorded by the individual who goes by the name Santiago.

30. None of these tapes were made available to me.

I, Chigbo Umeh, declare under the penalty of perjury that the above stated facts are true and correct.

Executed on the 16 day of April, 2014.



Chigbo Umeh